UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	7:19-cr-522-S1-4
	§	
DANIEL J. GARCIA	§	

DEFENDANT'S UNOPPOSED MOTION TO ADOPT MOTIONS OF CODEFENDANTS

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant DANIEL J. GARCIA, by and through his undersigned counsel, and respectfully moves to adopt and/or adapt and have the benefit of applicable motions filed by any co-defendant indicted in the above-styled action. As grounds for this motion, Defendant Garcia states as follows:

Defendant Garcia is charged in this case along with four co-defendants. Counsel for Defendant Garcia is aware that counsel for the co-defendants have and will file motions that may be applicable to Defendant Garcia.

To reduce the burden on this Court and with respect to repetitive pleadings, Defendant Garcia desires to adopt and/or adapt all applicable motions made by his co-defendants, not inconsistent with Defendant Garcia's position. Defendant Garcia will conform them, if necessary, and, if appropriate, will add supplemental memoranda of authority in support thereof.

Due to the complexity of this case and the nature of the charges and indictment, the above relief is necessary in the interest of justice, for due process of law, and for effective assistance of counsel.

WHEREFORE, PREMISES CONSIDERED, Defendant Garcia prays the Court grant this motion and allow him to adopt and/or adapt the applicable motions made by his co-defendants.

Respectfully submitted,

s/Christopher Sully
CHRISTOPHER SULLY
Attorney-in-Charge
Counsel for Daniel Garcia
Southern District of Texas 1119552
Texas State Bar No. 24072377
LAW OFFICE OF CHRIS SULLY
5804 N. 23rd St.
McAllen, TX 78504
Tel.: (956) 413-7271
Fax: (888) 990-1525
csully@sullylaw.com

CERTIFICATE OF CONSULTATION

Assistant U.S. Attorney Peter Nothstein indicated that the government is unopposed to this motion.

s/Christopher Sully
CHRISTOPHER SULLY

CERTIFICATE OF SERVICE

On June 21, 2021, this motion was served on all counsel of record via ECF.

s/Christopher Sully
CHRISTOPHER SULLY